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SEP 28 1999

RECLAMATION DISTRICT NO. 756
BOULDIN ISLAND

3697 Mt. Diablo Boulevard, Suite 100
Lafayette, CA 94549
Telephone (925) 283-4216

September 22, 1999

CALFED Bay-Delta Program
1416 Ninth Street, Suite 1148
Sacramento, CA 95814

Ladies/Gentlemen:

Re: Comments on CALFED Draft EIR/EIS

Reclamation District No. 2026 is pleased to submit some brief comments regarding the product of your very significant effort to resolve the "Delta dilemma" and so much more. We all need to remember that CALFED is a process, not a project. A basic cornerstone of the process involves adaptive management which will allow us to learn from our successes and failures and, at the same time, allow us to proceed before a single, final answer is agreed upon. We all need to continue to contribute to the process in order to ensure its success. It is in that spirit that the District offers some thoughts regarding the appropriateness of the early implementation of some levee integrity program expenditures.

The levee integrity element of the CALFED program appears to be relatively noncontroversial in nature and has a wide array of benefits including water supply reliability, water quality and ecosystem protection.

The Department of Water Resources, working closely with local reclamation districts, has very successfully administered a levee maintenance and restoration program for over a decade. The program, however, is in jeopardy because of a combination of under and intermittent funding. Reclamation districts simply cannot adequately plan maintenance and restoration work unless the funds are known to be available and at reasonable levels. We strongly urge that a component of early implementation funding be directed to the Department of Water Resources levee subvention program.

We strongly suggest that you reconsider any CALFED option that includes a newly constructed setback levee along the eastern bank of the Mokelumne River on Bouldin Island from a point a little north of the Highway 12 Bridge across the Mokelumne River to a point just upstream of the confluence of the Mokelumne and San Joaquin Rivers. A combination of peat soils and soft clays extend in the range of 65 feet below the existing ground surface. The construction of a new inboard levee which would be subjected to full tidal influence would be very expensive. Alternatively, you may wish to enlarge the cross-section of that portion of the river by additional dredging. There may

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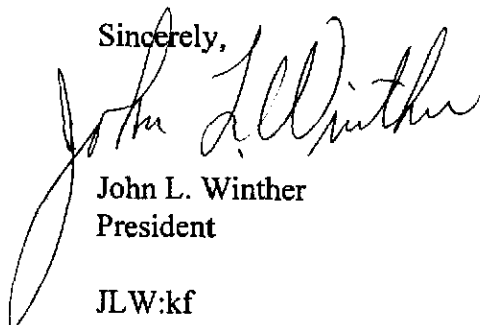
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be an opportunity to deposit dredge material onto Bouldin Island or perhaps onto Andrus Island where conflicts do not occur with existing infrastructure. We would be happy to provide you with the information we have with regard to soil conditions on Bouldin Island.

Thank you for considering these comments.

Sincerely,

A handwritten signature in cursive script, appearing to read "John L. Winther". The signature is written in dark ink and is positioned to the left of the printed name and title.

John L. Winther
President

JLW:kf